

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jeff REYES-Mejia,

Defendant(s)

Magistrate Case No. 08 AUG -4 AM 10: 14

08 MJ 2402


COMPLAINT FOR VIOLATION OF:

BY DEPUTY  
Title 8 U.S.C., Sec. 1324 (a)(1)(A)(ii)  
Transportation of Illegal  
Aliens

The undersigned complainant, being duly sworn, states:

On or about **July 31, 2008**, within the Southern District of California, defendant **Jeff REYES-Mejia** with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that alien, namely, **Julia FRANCO-Perez**, , had come to, entered and remained in the United States in violation of law, did transport and move, said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

  
SIGNATURE OF COMPLAINANT  
James Trombley  
Senior Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 4th DAY OF AUGUST 2008

  
Ruben B. Brooks  
UNITED STATES MAGISTRATE JUDGE

DOA 7/31/08 JDA

### PROBABLE CAUSE STATEMENT

I declare under the penalty of perjury that the following statement is true and correct:

Furthermore, the complainant states that **Julia FRANCO-Perez**, is a citizen of a country other than the United States; that said alien has admitted that she is deportable; that her testimony is material, that it is impracticable to secure her attendance at the trial by subpoena; and she is a material witness in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On July 31, 2008, at approximately 3:20 p.m., a San Diego Police Officer encountered a Jeep Grand Cherokee parked at the ARCO gasoline station located on Palm Avenue, San Diego, California. The ARCO Station is located approximately four miles north from the San Ysidro Port of Entry and across from the Palm Avenue Trolley stop. Alien smugglers often use the San Diego trolley system to transport illegal aliens from the United States/Mexico border into the interior of San Diego County.

In the Jeep Grand Cherokee there was a male seated in the driver's seat and a female in the front passenger seat. Officer Deyling stated he approached the driver of the vehicle and asked for identification documents on him and the passenger. The driver produced a California driver's license identifying himself as defendant **Jeff REYES-Mejia**, a United States citizen. The front passenger, a Hispanic female, failed to produce any form of identification. Officer Deyling requested the presence of a Border Patrol Agent to determine the immigration status of the Hispanic female.


At approximately 3:30 p.m., Border Patrol Agent V. Aguilar, assigned to the Smuggling Interdiction Group (SIG), responded to Officer Deyling's request. Agent Aguilar arrived to the scene and approached the defendant. Agent Aguilar was wearing plain-clothes attire with his badge visible hanging over his chest. Agent Aguilar identified himself as a Border Patrol Agent to the defendant and questioned him about his relationship to the front passenger female. The defendant stated he had come from Tijuana, Baja California, Mexico and that he was trying to meet her as a possible girlfriend.

Agent Aguilar then approached the front passenger female, later identified as **Julia FRANCO-Perez**, and identified himself to her as a Border Patrol Agent. Agent Aguilar questioned her as to her immigration status. **FRANCO** stated she was a citizen and national of Mexico without any immigration documents allowing her to be or remain legally in the United States. Agent Aguilar then questioned her as to her relationship to the driver. **FRANCO** stated he did not know him and that he was giving her a ride. Agent Aguilar placed **FRANCO** under arrest. Agent Aguilar then placed the defendant under arrest for suspicion of alien smuggling and transported them to the Chula Vista Border Patrol Station for further questioning.

**MATERIAL WITNESS STATEMENT:**

Material witness Julia FRANCO-Perez agrees that she is a citizen and national of Mexico illegally present in the United States. She admits to entering the United States illegally. FRANCO stated that she was to pay \$1,500.00 (USD) to be smuggled into the United States. Material witness FRANCO-Perez was shown a photographic line up and was able to identify defendant Jeff REYES-Mejia as the driver of the vehicle.

Executed on August 2, 2008, at 10:00 a.m.

  
Tomas M. Jimenez  
Senior Patrol Agent

On the basis of the facts presented in the probable cause statement consisting of two page(s), I find probable cause to believe that the defendant named in this probable cause statement committed the offense on July 31, 2008, in violation of Title 8, United States Code, Section 1324.

  
Anthony J. Battaglia  
United States Magistrate Judge

8/2/08 11:40 AM  
Date/Time